

### **REMARKS**

Applicants appreciate the examiner's thorough prior art search and consideration of the present application. Applicants have amended dependent Claims 3, 19 and 35 to correct the typographical errors identified in the Office Action. Applicants have also carefully considered the pending claim rejections. However, for the reasons discussed below, Applicants respectfully submit that the claims are patentable over the cited prior art.

Applicants note that the pending claims were renumbered consecutively by the examiner in the Notice of Allowance dated December 17, 2004. The June 29, 2005 Office Action references the claims as renumbered. Applicants have likewise presented the claims in the present amendment as they are renumbered by the Notice of Allowance. Applicants, however, have not indicated the renumbering as amendments to the claims. Thus, for example, Claim 9 in the above listing of claims is identified as an "Original" claim and includes no indication of amendment, even though Claim 9 above was numbered as Claim 10 when the present application was filed.

#### **I. The Rejections Under 35 U.S.C. § 103 Should be Withdrawn**

Claims 1-6, 8-22, 24-38 and 40-48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,128,663 to Thomas ("Thomas") in view of U.S. Patent Publication No. 2003/0093384 A1 to Durst Jr., et. al. ("Durst") and U.S. Patent Publication No. 2001/0032254 A1 to Hawkins ("Hawkins"). Claims 7, 23 and 39 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Thomas, Durst and Hawkins further in view of U.S. Patent No. 5,991,735 to Gerace ("Gerace"). Applicants respectfully traverse these rejections.

#### **A. The Rejection of Claim 1**

Independent Claim 1 of the present application recites as follows:

1. A method of associating dynamically generated Web page content with a user who requests a Web page from a Web server, wherein the user makes the Web page request via a Web client in communication with the Web server, the method comprising the following steps performed by the Web server:

storing a record of the user request within a Web server log;

generating the requested Web page, wherein the generated Web page includes a content object having a unique identifier associated therewith, wherein the unique identifier is generated via a hashing function;

serving the generated Web page to the Web client; and

appending the stored record of the user request with the unique identifier associated with the content object included within the generated Web page.

The Office Action cites to Thomas as teaching each of the recitations of Claim 1 except for (1) the web server log and (2) that the unique identifier is generated via a hashing function. (Office Action at 3-4). The Office Action cites to Durst as teaching "demographic and user information is stored in a web server log" and to Hawkins as teaching that a "unique identifier is generated via [a] hashing function along with each hyperlink." (Office Action at 4). Applicants respectfully submit that the rejection of Claim 1 should be withdrawn for at least the six (6) independent reasons set forth in the following four (4) subsections.

1. Thomas Does Not Teach Storing a Record of a User Request

The first clause of Claim 1 after the preamble recites "storing a record of the user request within a Web server log." The Office Action states that Thomas, at Col. 4, lines 23-52, teaches "storing a record of a user request within a web server." However, what the cited portion of Thomas discusses is how a user can log in with a remote server and provide the remote server demographic information relating to the user. Thus the information that is obtained (and possibly stored) by the remote server **is user demographic information**. However, what Claim 1 recites is that a record of **a user's request for a Web page** is stored. Consequently, Thomas does not teach or disclose "storing a record of a user request within a web server" as argued in the rejection of Claim 1 and, as such, the rejection of Claim 1 should be withdrawn.

2. Thomas Does Not Teach Appending Content Object Identifiers to Stored Records of User Requests

The last clause of Claim 1 recites "appending the stored record of the user request with the unique identifier associated with the content object included within the generated Web page." Thus, according to this clause of Claim 1, the unique identifiers that are associated with the content objects are appended to the record in the log file of the users original request for a Web page. The Office Action states that Thomas, at Col. 7, lines 18-30,

teaches this recitation of Claim 1. (Office Action at 3-4). However, what the cited portion of Thomas discusses is appending demographic information to a request for a web page that is sent to a remote server. Accordingly, the cited portion of Thomas fails to teach or disclose appending a unique identifier that is associated with the content objects to anything, as the demographic information (the only thing "appended" in the cited portion of Thomas) clearly is (1) **not a "unique identifier"** and (2) is **not "associated with the content objects."** Moreover, the demographic information is appended to a request for a web page. In contrast, what the last clause of Claim 1 recites is that the unique identifiers are **appended to a record in a log file**. Accordingly, the cited portion of Thomas fails to teach three different (and independent) aspects of the last clause of Claim 1, providing three additional, independent reasons for withdrawal of the rejection of Claim 1.

3. **The Cited References Do Not Teach or Suggest Storing Records of User Requests**

The Office Action concedes that Thomas does not teach storing a record of a user request "within a Web server log." (Office Action at 4). As discussed above, Thomas does not teach storing a record of a user request anywhere. The Office Action cites to Durst as teaching that "demographic and user information is stored in a web server log." (Office Action at 4). Even assuming, *arguendo*, that this is the case, it is clear that the combination of Thomas and Durst fail to teach or disclose "storing a record of a user request within a Web server log" as recited in Claim 1 as neither Thomas nor Durst are storing "a record of a user request." Demographic information is not a record of a request for a web page, nor is the unspecified "user data" discussed in the cited portions of Durst. Accordingly, the failure of the cited combination of references to teach "storing a record of a user request within a Web server log" provides yet another basis for withdrawal of the rejection of Claim 1.

4. **The Requisite Motivation to Combine References Has Not Been Shown**

To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the reference teachings in the manner suggested. M.P.E.P. § 2143. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the

combination. M.P.E.P. § 2143.01, citing *In re Mills*, 916 F.2d 680, 16 U.S.P.Q.2d 1430 (Fed. Cir. 1990). As emphasized by the Court of Appeals for the Federal Circuit, to support combining references, evidence of a suggestion, teaching, or motivation to combine must be clear and particular, and this requirement for clear and particular evidence is not met by broad and conclusory statements about the teachings of references: *In re Dembiczak*, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999).

Applicants submit that such a showing of motivation to combine Thomas and Durst has not been made here. Thomas is directed to methods and apparatus for "customization of information content provided to a requestor over a network. (Thomas at Title). Durst, on the other hand, is directed to a "scanner enhanced remote control unit and system for automatically linking to online resources." (Durst at Title). Applicants respectfully submit that these references have nothing to do with each other, and that there is no reason other than a hindsight effort to recreate the invention of Claim 1 to combine teachings from these two disparate and unrelated references.

#### **B. The Rejections of Claims 2-7**

Claim 2 depends from Claim 1 and hence is patentable over the cited art for the same reasons, discussed above, that Claim 1 is patentable. Claim 2 recites that "the record of the request includes information that identifies the user." The Office Action cites to Col. 4, lines 23-52, lines 49-58 of Thomas as teaching the recitation of Claim 2. While the cited portion states that the user is identified, nowhere does it state that the identity of the user is **included in a record of a request for a web page**. Accordingly, Claim 2 is independently patentable over the cited art for at least this additional reason.

Claim 5 depends from Claim 1 and hence is patentable over the cited art for the same reasons, discussed above, that Claim 1 is patentable. Claim 5 recites "analyzing a plurality of stored user request records to determine Web content preferences of a user." The Office Action states, without citation, that Thomas teaches the recitation of Claim 5. (Office Action at 5). Applicants believe that this reflects a typographical error, and that the intention was to state that Thomas did **not** teach the recitation of Claim 5. The Office Action further states that Durst, at paragraph 59, teaches the recitation of Claim 5, and that it would have been obvious to incorporate this teaching from Durst into Thomas. (Office Action at 5-6). While the cited portion of Durst discusses determining the name and "other useful information

relating to users who have accessed its web site", Durst does not teach or disclose analyzing stored user request records "**to determine Web content preferences of a user**" as recited in Claim 5. Accordingly, Claim 5 is independently patentable over the cited art for at least this additional reason.

Dependent Claims 3-4 and 6-7 are patentable over the cited art for at least the same reasons, discussed above, that the claims from which they depend are patentable.

### **C. The Rejection of Claims 8-11**

The Office Action does not address all of the recitations of Independent Claim 8. Applicants assume that the Office Action takes the position that the unaddressed recitations of Claim 8 are taught by the cited references for the same reasons that identical or similar recitations in Claim 1 were asserted to be taught by the prior art. Accordingly, for the reasons discussed above with respect to Claim 1, Applicants respectfully submit that the cited art fails to teach or disclose the "storing a record of the user request within a Web server log" and the "appending the stored record of the user request with the first and second unique identifiers associated with the first and second content objects included within the generated Web page" recitations of Claim 8. Thus, the rejection of Claim 8 should be withdrawn for at least the exact same reasons that the rejection of Claim 1 should be withdrawn.

Claims 9, 10 and 11 stand rejected based on the same rationale as Claims 2, 4 and 5, respectively. Thus, the rejections of Claims 9, 10 and 11 should be withdrawn for the same reasons, discussed above, that the rejections of Claims 2, 4 and 5, respectively, should be withdrawn.

### **D. The Rejection of Claims 12-16**

The Office Action does not address all of the recitations of Independent Claim 12. Applicants assume that the Office Action takes the position that the unaddressed recitations of Claim 12 are taught by the cited references for the same reasons that identical or similar recitations in Claim 1 were asserted to be taught by the prior art. Accordingly, for the reasons discussed above with respect to Claim 1, Applicants respectfully submit that the cited art fails to teach or disclose the "storing a record of the user request within a Web server log" and the "appending the stored record of the user request with the unique identifier associated with the content object included within the generated Web page" recitations of Claim 12.

Thus, the rejection of Claim 12 should be withdrawn for at least the exact same reasons that the rejection of Claim 1 should be withdrawn.

Claims 13, 14, 15 and 16 stand rejected based on the same rationale as Claims 2, 3, 4 and 5, respectively. Thus, the rejections of Claims 13, 14, 15 and 16 should be withdrawn for the same reasons, discussed above, that the rejections of Claims 2, 3, 4 and 5, respectively, should be withdrawn.

**E. The Rejection of Claims 17-48**

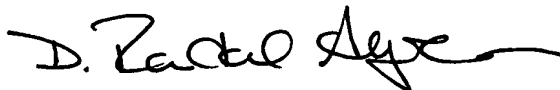
Claims 17-32 are rejected based on the same rationale used to reject Claims 1-16, respectively. Thus, the rejections of Claims 17-32 should be withdrawn for the same reasons, discussed above, that the rejections of Claims 1-16, respectively, should be withdrawn.

Claims 33-48 are rejected based on the same rationale used to reject Claims 1-16, respectively. Thus, the rejections of Claims 33-48 should be withdrawn for the same reasons, discussed above, that the rejections of Claims 1-16, respectively, should be withdrawn.

**II. Conclusion**

In light of the above discussion, Applicants respectfully submit that the pending claims are in condition for allowance, which is respectfully requested.

Respectfully submitted,

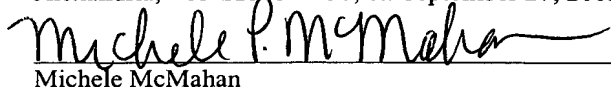


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